IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

3.5

v.

Plaintiff,

Case No. CR-21-151-TDD

BILLY JAMES MENEES and ASHLEY DAWN MARIE SCHARDEIN,

Defendants.

## SUPERSEDING INDICTMENT

The Federal Grand Jury charges:

## **COUNT ONE**

CHILD ABUSE IN INDIAN COUNTRY [18 U.S.C. §§ 1151, 1152, 2 & 21 O.S. § 843.5(A)]

Beginning in or about January 2019 and continuing until on or about May 9, 2020, within the Eastern District of Oklahoma, in Indian Country, the defendants, BILLY JAMES MENEES. a non-Indian, and ASHLEY DAWN MARIE SCHARDEIN, a non-Indian, did willfully and maliciously cause and threaten harm, fail to protect from harm and threaten harm, torture and injure K.M., an Indian, all while defendants were responsible for the health, safety and welfare of K.M., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151, 1152, 2, and Title 21, Oklahoma Statutes, Section 843.5(A).

## **COUNT TWO**

CHILD NEGLECT IN INDIAN COUNTRY [18 U.S.C. §§ 1151, 1152, 2 & 21 O.S. § 843.5(C)]

Beginning in or about January 2019 and continuing until on or about May 9, 2020, within the Eastern District of Oklahoma, in Indian Country, the defendants, BILLY JAMES MENEES, a non-Indian, and **ASHLEY DAWN MARIE SCHARDEIN**, a non-Indian, did willfully and maliciously fail and omit to provide K.M., an Indian, adequate nurturance and affection, food, clothing, shelter, sanitation, hygiene, medical care and supervision, all while defendants were responsible for the health, safety and welfare of K.M., a child under the age of eighteen, in violation of Title 18, United States Code, Sections 1151, 1152, 2, and Title 21, Oklahoma Statutes, Section 843.5(C).

A TRUE BILL:

CHRISTOPHER J. WILSON United States Attorney

EDITH A. SINGER, OBA # 19439

Assistant United States Attorney

Pursuant to the E-Government Act, the original indictment has been filed under seal in the Clerk's Office.

s / Foreperson

FOREPERSON OF THE GRAND JURY